



**Sunoco Logistics**



**Sunoco Pipeline L.P.**  
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July 1, 2004

Hon. Michael K. Powell  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW.,  
Washington, DC 20554

Subject: 47 CFR Part 54 (CC Docket No. 92-105; FCC 04-111)  
The Use of N11 Codes and Other Abbreviated Dialing Arrangements

Dear Mr. Chairman,

I am writing on behalf of Sunoco Pipeline L.P. to thank you and the Federal Communications Commission for issuing the Notice of Proposed Rulemaking to establish and implement a nationwide toll-free three-digit number for access to our nation's 62 one-call centers.

Sunoco Pipeline L.P. operates over 4,500 miles of hazardous liquids pipelines located in 13 states serving the Northeast, Midwest, and South Central portions of the country. These pipelines transport crude oil and refined petroleum products from the crude oil fields to refineries and onto truck loading terminals. Protection of these underground pipelines from potential damage due to excavation activities involves 15 different "One Call" notification systems, each with a different phone number.

Implementing a nationwide toll-free three-digit telephone number for one-call notification is in the best interest of our nation and is required by the Public Law 107-355, the Pipeline Safety Improvement Act of 2002. This Act was signed into law by President Bush on December 17, 2002.

Sunoco Pipeline L.P. strongly supports the North American Numbering Council recommendation to assign 811 as the nationwide, toll-free number for excavators to contact the appropriate one-call center prior to digging. However, if the FCC determines that another number, such as 344, is preferable for technical reasons, we will also support such as decision.

We support the continued use of "#344" in the wireless community, local seven-digit numbers and toll-free ten-digit numbers currently used by one-call centers, in addition to the three-digit number chosen by the FCC. The objective is to provide several alternatives

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for excavators to call before work begins and have the underground facilities marked. It does not matter *which* number they use as long as they remember and use *a* number.

We do not support the use of shared (dual use), three-digit numbers. The Common Ground Alliance, the leading national one-call center and underground damaged prevention organization, estimates that the 62 centers currently receive 15,000,000 calls annually. CGA data also indicates that approximately 40% of damages were caused by those who did not call before digging. The potential incoming call volume to One Call Centers over the next few years could well exceed 20 million. Adding an additional interface to callers could discourage the use of the service and reduce the effectiveness and purpose of the 62 centers.

Sunoco Pipeline L.P. does not support the use of a ten-digit number in place of the three-digit number required by law. One-call centers currently have ten-digit numbers. Converting to a new number would add no benefit to the system and would be rejected by most, if not all of the centers. Further, these existing numbers should continue to operate at the one-call centers' direction and expense. Again, the objective is to provide options that increase the likelihood of excavators using the systems.

I urge you to move forward expeditiously with this important rule and to select the fastest, least-cost option for implementing the nationwide toll free three-digit number.

Thank you for the opportunity to make our views known.

Yours truly,

**David B. Meadows**

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